

Atlantic Richfield Company

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Anthony R. Brown
Project Manager, Mining

September 7, 2017

Dana Barton and Gary Riley
Remedial Project Manager, Superfund Division
U.S. Environmental Protection Agency, Region 9
75 Hawthorne Street, 10th Floor (SFD 7-1)
San Francisco, California 94105

**Subject: U.S. EPA's August 7, 2017 Letter Regarding (1) Focused Feasibility Study
Revegetation Treatability Study Work Plan and (2) Supplemental 2017 Soil
Sampling for Soil pH in Revegetation Plots**
Leviathan Mine Site
Alpine County, California

Dear Ms. Barton and Mr. Riley:

Atlantic Richfield Company (Atlantic Richfield) submits this letter in response to the U.S. Environmental Protection Agency's (U.S. EPA's) August 7, 2017 letter providing review comments on the following:

1. Response to Comments and Transmittal of Final Focused Feasibility Study Revegetation Treatability Study Work Plan, Leviathan Mine Site, Alpine County California, dated September 9, 2016, and
2. Supplemental 2017 Soil Sampling for Soil pH in Revegetation Plots, Leviathan Mine Site, Alpine County California, dated July 19, 2017.

The Focused Feasibility Study Revegetation Treatability Study Work Plan is being implemented in partial fulfillment of the requirements of the Statement of Work attached to the Administrative Order for Remedial Investigation and Feasibility Study, Comprehensive Environmental Response, Compensation, and Liability Act Docket No. 2008-18 issued by the U.S. EPA on June 23, 2008.

In its letter dated August 7, 2017, the U.S. EPA provided the following comments:

- Workplan: EPA has considered ARC's response to comments and finds that the September 9, 2016 submittal adequately addressed EPA's July 7, 2017 comments at this time; with the following observations:
 - Monitoring Reports and Corrective Measures: EPA did not receive the requested monthly monitoring reports with ARC's summary of recommended corrective measures.
 - Revegetation Treatability Study Report: EPA looks forward to receipt of the monitoring data, details, and information on corrective measures taken, in the Treatability Study Report.

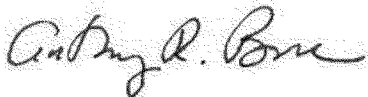


- Feasibility Study: The majority of EPA and stakeholder comments were addressed. For those comments that we not addressed or are deferred, per ARC's response to comments, EPA looks forward to receipt of monitoring data, details, and evaluation addressed in the Treatability Study Report and the Feasibility Study (FS).
- 2017 Supplemental Sampling: EPA has completed its review of the July 17, 2017 submittal recommending supplemental sampling. ARC notes that additional information will assist in evaluating and refining performance monitoring over the course of the study. EPA has completed its review and has no additional comments on the proposed sampling.

Atlantic Richfield acknowledges each of the comments; however, we would like to correct the administrative record with respect to the U.S. EPA's first observation indicating that it did not receive the requested monthly monitoring reports. Atlantic Richfield respectfully brings to the U.S. EPA's attention that we did submit Revegetation Treatability Study Status reports on July 28, 2016, September 1, 2016, October 3, 2016 and November 1, 2016.

If you have any questions or comments, please feel free to contact me at (657) 5294537 or anthony.brown@bp.com.

Sincerely,



Anthony R. Brown
Project Manager, Mining

cc: John Hillenbrand, U.S. Environmental Protection Agency, Region 9 – via electronic copy
Douglas Carey, Lahontan Regional Water Quality Control Board – via electronic copy
Scott Ferguson, Lahontan Regional Water Quality Control Board – via electronic copy
Ronald Halsey, Atlantic Richfield Company – via electronic copy
Nathan Block, Esq., BP – via electronic copy
Adam Cohen, Esq., Davis Graham & Stubbs, LLP – via electronic copy
Sandy Riese, EnSci, Inc. – via electronic copy
Marc Lombardi, Amec Foster Wheeler – via electronic copy
Grant Ohland, Ohland HydroGeo, LLC – via electronic copy
Dave McCarthy, Copper Environmental Consulting – via electronic copy
Cory Koger, U.S. Army Corps of Engineers – via electronic copy
Greg Reller, Burleson Consulting – via electronic copy
Ken Maas, U.S. Forest Service, Humboldt-Toiyabe National Forest – via electronic copy
Neil Mortimer, Washoe Tribe of California and Nevada – via electronic copy
Norman Harry, Washoe Tribe of California and Nevada – via electronic copy and hard copy
Cale Pete, Washoe Tribe of California and Nevada – via electronic copy

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Susan Jamerson, Washoe Tribe of California and Nevada – via electronic copy
Fred Kirschner, AESE, Inc. – via electronic copy and hard copy

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